

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

WSOU INVESTMENTS, LLC d/b/a  
BRAZOS LICENSING AND  
DEVELOPMENT,

Plaintiff,

v.

XILINX, INC.,

Defendant.

C.A. No. 20-1228-CFC-JLH  
C.A. No. 20-1229-CFC-JLH  
C.A. No. 20-1231-CFC-JLH  
C.A. No. 20-1232-CFC-JLH  
C.A. No. 20-1233-CFC-JLH

**JOINT MOTION FOR TELECONFERENCE  
TO RESOLVE PROTECTIVE ORDER DISPUTE**

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“WSOU”) and Defendant Xilinx, Inc. (“Xilinx”) (collectively, “Parties”) respectfully move this Court to schedule a teleconference to address the following outstanding disputes regarding the proposed Protective Order:

1. Source Code

- a) Source Code designations
- b) Definition of Source Code
- c) Printed Copies of Source Code
- d) Note Taking Procedure for Source Code Review
- e) Deposition Procedure for Source Code

2. Prosecution Bar Scope

### 3. Export Control Provisions

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in telephonic meet-and-confer discussions on August 25 and 27, 2021:

Delaware Counsel:

Plaintiff: Andrew DeMarco

Defendant: Anne Shea Gaza, Beth A. Swadley

Lead Counsel:

Plaintiff: Joshua A. Whitehill

Defendant: Thomas W. Ritchie, Stephanie M. Mishaga

In accordance with the previously filed Stipulation to Extend Time (D.I. 50 in C.A. Nos. 20-1228; 20-1229; 20-1231; 20-1232 and D.I. 49 in C.A. No. 20-1233), with the Court's approval, the Parties shall each file a 3-page letter brief addressing the disputes identified above by 10:00 am on September 1, 2021 (*i.e.*, at least 48 hours before the scheduled September 3, 2021 Scheduling Conference).

As set forth in the above referenced Stipulation, the Parties respectfully request the Court hear argument on the disputed provisions of the proposed Protective Order at the upcoming Scheduling Conference on September 3, 2021. If the Court, however, would prefer to hear these arguments at a different time, then the Parties provide the following alternative dates for the Court's consideration: September 7,

2021 or September 9, 2021. The Parties will make themselves available on the foregoing dates or otherwise at the Court's convenience.

Dated: August 27, 2021

DEVLIN LAW FIRM LLC

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*Attorneys for Plaintiff*

*Attorneys for Xilinx, Inc.*

SO ORDERED this \_\_\_\_\_ day of August, 2021.

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United States Magistrate Judge